

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

VICOF II TRUST; VIDA LONGEVITY FUND, LP;  
WELLS FARO BANK, NATIONAL  
ASSOCIATION, as securities intermediary for  
VICOF II TRUST and VIDA LONGEVITY FUND,  
LP; and PF PARTICIPATION FUNDING TRUST,

Plaintiffs,

v.

JOHN HANCOCK LIFE INSURANCE COMPANY  
OF NEW YORK,

Defendant.

Index No. 19-cv-11093 (AKH)

VICOF II TRUST; VIDA LONGEVITY FUND, LP;  
LIFE ASSETS TRUST II S.A. DELAWARE TRUST;  
VIDAQUANT SUBFUND DELAWARE TRUST;  
VIDA INSURANCE FUND II SERIES INTERESTS  
OF THE SALI MULTI-SERIES FUND, LP; WELLS  
FARGO BANK, NATIONAL ASSOCIATION, as  
securities intermediary for VICOF II TRUST, VIDA  
LONGEVITY FUND, LP, LIFE ASSETS TRUST II  
S.A. DELAWARE TRUST, VIDAQUANT  
SUBFUND DELAWARE TRUST, and VIDA  
INSURANCE FUND II SERIES INTERESTS OF  
THE SALI MULTI-SERIES FUND, LP; DLP  
MASTER TRUST; DLP MASTER TRUST II; GWG  
DLP MASTER TRUST LIFE FUNDING TRUST; PF  
PARTICIPATION FUNDING TRUST; and PALM  
BEACH SETTLEMENT COMPANY,

Plaintiffs,

v.

JOHN HANCOCK LIFE INSURANCE COMPANY  
(U.S.A.),

Defendant.

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EFG BANK AG, CAYMAN BRANCH; and WELLS  
FARGO BANK, NATIONAL ASSOCIATION, as  
securities intermediary for EFG BANK AG,  
CAYMAN BRANCH,

Plaintiffs,

v.

JOHN HANCOCK LIFE INSURANCE COMPANY  
(U.S.A.),

Defendant.

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**[PROPOSED] ORDER REGARDING DEFENDANTS’  
MOTION FOR CONTINUED SEALING**

Pursuant to the May 28, 2020 Court-approved Stipulated Confidentiality Agreement and Protective Order, ECF No. 34 (the “Protective Order”), and Rule 4(B) of the Individual Rules of the Honorable Alvin K. Hellerstein, Defendants John Hancock Life Insurance Company of New York and John Hancock Life Insurance Company (U.S.A.) (“John Hancock”) move to maintain under seal or in redacted form materials identified in Exhibits 1, 2, and 3 hereto and attached, respectively, to: (i) the Declaration of Khai LeQuang in Opposition to John Hancock’s Motions *in Limine* Nos. 1-11; (ii) the Declaration of Richard W. Krebs in Support of Plaintiffs’ Opposition to John Hancock’s Renewed Motion for Summary Judgment; and (iii) the Declaration of Larry Stern in Support of Plaintiffs’ Opposition to John Hancock’s Renewed Motion for Summary Judgment.

For the reasons set forth in John Hancock’s Memorandum of Law and the Declaration of Zahir Bhanji, John Hancock’s motion is **GRANTED**.

**IT IS SO ORDERED.**

Dated: March 13, 2023

/s/ Alvin Hellerstein

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THE HONORABLE ALVIN K. HELLERSTEIN  
UNITED STATES DISTRICT JUDGE

**EXHIBIT 1**

<b>LeQuang Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
78	Redacted Portions of Expert Report of Timothy Pfeifer	Redactions to this Exhibit are approved consistent with this Court's prior sealing orders. <i>See</i> ECF Nos. 195, 215.
79	Excerpts of Transcript of Deposition of Faisel Gulamhussein	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters and product management practices.
80	Excerpts of Transcript of 30(b)(6) Deposition of Zahir Bhanji	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters and product management practices.
81	John Hancock Internal Policy Document	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters and product management practices.
87	Excerpts of Transcript of January 19, 2021 Deposition of Geoff Gittins	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product management practices.
88	Excerpts of Transcript of Deposition of Catherine Murphy	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product management practices.
89	Excerpts of Transcript of January 15, 2021 Deposition of Geoff Gittins	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product management practices.
90	Product Management Presentation	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product management practices.

<b>LeQuang Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
91	Correspondence Regarding Development of Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
94	Presentation Regarding Mortality Experience Monitoring and Assumption Development	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
95	Excerpts of Transcript of Deposition of Courtney O'Connor	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters and product management practices.
96	Excerpts of Transcript of Deposition of P.J. Beltramini	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters and product management practices.
97	Memorandum Regarding John Hancock Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
99	John Hancock Life Insurance Product Pricing Memorandum	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
100, 101	Correspondence and Attached Presentation Regarding John Hancock Business Strategy	The Exhibits are sealed in their entirety because they contain discussion of confidential, non-public business strategy.
102	Presentation Regarding John Hancock Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.

<b>LeQuang Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
103	Presentation Regarding John Hancock Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
104	Presentation Regarding John Hancock Business Strategy and Contemplated Strategic Initiatives	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
105	Presentation Regarding John Hancock Business Strategy and Contemplated Strategic Initiatives	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
108	Excerpts of Transcript of Deposition of Helene Pouliot	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product pricing and management practices.
109	Presentation Regarding John Hancock Business Strategy and Contemplated Strategic Initiatives	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
111	Excerpts of Transcript of July 6, 2022 Deposition of Larry Stern	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters and analysis of product performance and profitability.
112	Excerpts of Transcript of July 7, 2022 Deposition of Larry Stern	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters and analysis of product performance and profitability.
114	Proprietary John Hancock Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.

<b>LeQuang Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
115	Proprietary John Hancock Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
116	Excerpts of Transcript of Deposition of Bruce Winterhof	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, analysis of product performance and profitability, and contemplated strategic initiatives.
117	Confidential Third-Party Report	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, analysis of product performance and profitability, and contemplated strategic initiatives.
118	John Hancock Life Insurance Product Pricing Memorandum	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
119	John Hancock Life Insurance Product Pricing Memorandum	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
122	Proprietary John Hancock Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
123	Proprietary John Hancock Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
124	Presentation Regarding Cost of Insurance Rate Redetermination	Exhibit is sealed in its entirety because it contains discussion of proprietary and

LeQuang Decl. Exhibit	Description	Sealing Treatment
		confidential pricing parameters, projections, and analysis of product performance and profitability.
125	John Hancock Life Insurance Product Pricing Document	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
126	Proprietary John Hancock Mortality Memorandum	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
127	Correspondence Regarding Pricing of John Hancock Life Insurance Product	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
129	Correspondence Regarding Cost of Insurance Rate Redetermination	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
130	Correspondence Regarding Cost of Insurance Rate Redetermination, Contemplated Strategic Initiatives	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability, and contemplated strategic initiatives.
131	Excerpts of Transcript of Deposition of Naveed Irshad	The Exhibit is sealed in its entirety because it contains discussion of contemplated strategic initiatives.
132	Redacted Portions of Excerpts of Transcript of November 18, 2021 Deposition of Zahir Bhanji	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential product pricing and management practices.



LeQuang Decl. Exhibit	Description	Sealing Treatment
N/A	Redacted Portions of Oppositions to John Hancock's Motions <i>in Limine</i> Nos. 1-11 that Refer to and/or Summarize Sealed Exhibits to the LeQuang Declaration	Redactions to references and/or summaries in Plaintiffs' Oppositions to John Hancock's Motions <i>in Limine</i> Nos. 1-11 to the Exhibits to the LeQuang Declaration that are the subject of this Motion are approved.
N/A	Redacted Portions of Plaintiffs' Pretrial Memorandum that Refer to and/or Summarize Sealed Exhibits to the LeQuang Declaration	Redactions to references and/or summaries in Plaintiffs' Pretrial Memorandum to the Exhibits to the LeQuang Declaration that are the subject of this Motion are approved.

**EXHIBIT 2**

<b>Krebs Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
8	Confidential Submission to State Insurance Regulator Concerning New Product Issuance	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters.
12	John Hancock Life Insurance Product Pricing Memorandum	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
13	Redacted Portions of Excerpts of Transcript of December 9, 2020 Deposition of Stephen O'Brien	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters.
14	Correspondence Regarding Pricing of John Hancock Life Insurance Produce	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
15	John Hancock Life Insurance Product Pricing Memorandum	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
16	John Hancock Life Insurance Product Pricing Memorandum	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
17	John Hancock Life Insurance Product Pricing Memorandum	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.

<b>Krebs Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
18	John Hancock Life Insurance Product Pricing Memorandum	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
19	Proprietary John Hancock Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
20	John Hancock Life Insurance Product Pricing Memorandum	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
21	Proprietary John Hancock Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
22	Correspondence Regarding Development of Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
23	John Hancock Life Insurance Product Pricing Documentation	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
24	Correspondence Regarding John Hancock Life Insurance Product Pricing	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
25	John Hancock Life Insurance Product Pricing Memorandum	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing

<b>Krebs Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
		parameters, projections, and analysis of product performance and profitability.
26	Correspondence Regarding John Hancock Life Insurance Product Pricing	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
27	Correspondence Regarding John Hancock Life Insurance Product Pricing	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
28	Correspondence Regarding John Hancock Life Insurance Product Pricing	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
29	Correspondence Regarding John Hancock Life Insurance Product Pricing	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
33	John Hancock Life Insurance Product Pricing Documentation	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
34	Presentation Regarding John Hancock Financial Performance and Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public financial performance and business strategy.
35	Presentation Regarding John Hancock Product Pricing and Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability,

<b>Krebs Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
		and confidential, non-public financial performance and business strategy.
38	Correspondence Regarding Product Management Practices	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product pricing and management practices.
39	Presentation Regarding Product Management Practices	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product pricing and management practices.
40	Correspondence Regarding Product Management Practices	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product pricing and management practices.
41	Correspondence and Attached Presentation Regarding Product Management Practices	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product pricing and management practices.
42	Correspondence Regarding Product Management Practices	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product pricing and management practices.
43	Memorandum Regarding John Hancock Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
44	Presentation Regarding John Hancock Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
45	Correspondence Regarding John Hancock Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.

<b>Krebs Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
46	Presentation Regarding John Hancock Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
47	Presentation Regarding John Hancock Business Strategy and Contemplated Strategic Initiatives	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy and contemplated strategic initiatives.
48	Presentation Regarding John Hancock Business Strategy and Contemplated Strategic Initiatives	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy and contemplated strategic initiatives.
49	Presentation Regarding John Hancock Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
50	Redacted Portions of Excerpts of Transcripts of November 9, 2021 Deposition of Faisel Gulamhussein	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices.
51	Redacted Portions of Excerpts of Transcripts of November 16, 2021 Deposition of Zahir Bhanji	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices.
52	Confidential Submission to State Insurance Regulator Regarding Cost of Insurance Rate Redetermination	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
53	Presentation Regarding Product Performance and Management Practices	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters,

Krebs Decl. Exhibit	Description	Sealing Treatment
		projections, analysis of product performance and profitability, and product management practices.
54	Presentation Regarding Mortality Experience Monitoring and Assumption Development	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
55	Redacted Portions of Excerpts of Transcript of October 23, 2020 Deposition of Naveed Irshad	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices and disputes with policyholders.
56, 57	Correspondence Regarding Product Management and Attached Spreadsheet	The Exhibits are sealed in their entirety because they contain discussion of proprietary and confidential product management practices.
58	John Hancock Life Insurance Product Pricing Document	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
59	Third-Party Presentation Regarding John Hancock Business Strategy	The Exhibit is sealed in its entirety because it contains discussion of confidential, non-public business strategy.
60	Confidential Notes Documenting Telephone Conference	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
61	Redacted Portions of Excerpts of Transcript of Deposition of Helene Pouliot	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices.

<b>Krebs Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
62	Presentation Regarding Product Performance and Management Practices	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and product management practices.
63	Correspondence Regarding John Hancock Life Insurance Product Pricing	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
64	Correspondence Regarding Cost of Insurance Rate Redetermination	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
65	Correspondence Regarding Cost of Insurance Rate Redetermination, Contemplated Strategic Initiatives	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability, and contemplated strategic initiatives.
66	Proprietary John Hancock Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
68	Confidential Regulatory Submission Regarding Product Management Practices	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product management practices.
69	Proprietary John Hancock Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
70	Confidential Regulatory Submission Regarding Product Management Practices	Exhibit is sealed in its entirety because it contains discussion of proprietary and



<b>Krebs Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
		confidential product management practices.
71	Document Analyzing Reserve Changes	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential information regarding financial performance and product management practices.
72	Proprietary John Hancock Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
73	Presentations Regarding Proprietary Mortality Experience and Assumption Development	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
74	Redacted Portions of Excerpts of Transcript of November 18, 2021 Deposition of Zahir Bhanji	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices.
75	Redacted Portions of Excerpts of Transcript of October 26, 2021 Deposition of P.J. Beltramini	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices.
76	Redacted Portions of Excerpts of Transcript of March 17, 2021 Deposition of Courtney O'Connor	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices.
77	John Hancock Experience Monitoring Guidelines	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential experience monitoring and assumption development guidelines.

<b>Krebs Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
78	Presentation Analyzing Reserve Changes	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential information regarding financial performance and product management practices.
79	Document Containing Proprietary Experience Data	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential experience data.
80	Confidential Third-Party Report	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, analysis of product performance and profitability, and contemplated strategic initiatives.
81	Confidential Third-Party Report	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, analysis of product performance and profitability, and contemplated strategic initiatives.
83	Document Including Proprietary Analysis Related to Cost of Insurance Rate Redetermination	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, analysis of product performance and profitability.
84	Confidential Correspondence Between John Hancock and State Insurance Regulator	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices.
85	Confidential Correspondence Between John Hancock and State Insurance Regulator	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices.

<b>Krebs Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
86	Document Including Proprietary Analysis Related to Cost of Insurance Rate Redetermination	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, analysis of product performance and profitability.
89	Expert Report of Gregory V. Serio	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters and regulatory environment.
90	Confidential Correspondence Between John Hancock and State Insurance Regulator	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices.
92	Confidential Draft Talking Points for Potential Discussion with State Insurance Regulator	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
94	Redacted Portions of Excerpts of Transcript of October 20, 2020 Deposition of Tony Teta	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices.
95	Correspondence Regarding Cost of Insurance Rate Redetermination	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
96	John Hancock Internal Policy Document	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters and product management practices.
99	Redacted Portions of Excerpts of Transcript of July 12, 2022	Redactions to the Exhibit are approved because it contains discussion of

<b>Krebs Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
	Deposition of Timothy Pfeifer	proprietary and confidential pricing parameters and product management practices.
103	Correspondence Regarding Cost of Insurance Rate Redetermination	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product management practices.
104	Correspondence Regarding Cost of Insurance Rate Redetermination	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product management practices.
105	Correspondence Regarding Cost of Insurance Rate Redetermination	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product management practices.
106	Correspondence Regarding Cost of Insurance Rate Redetermination	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product management practices.
107	Correspondence Regarding Cost of Insurance Rate Redetermination	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product management practices.
108	Confidential Regulatory Submission Regarding Product Management Practices	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, profitability analysis, and product management practices.
109	Redacted Portions of Excerpts of Transcript of October 30, 2020 Deposition of Brooks Tingle	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices.
110	Redacted Portions of Excerpts of Transcript of November 11, 2021	Redactions to the Exhibit are approved because it contains discussion of

<b>Krebs Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
	Deposition of Faisel Gulamhussein	proprietary and confidential pricing parameters and product management practices.
117	Correspondence Regarding Cost of Insurance Rate Redetermination	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions, pricing parameters, and product management practices.
121	Presentation Regarding Cost of Insurance Rate Redetermination	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions, pricing parameters, and product management practices.
122	Presentation Regarding Cost of Insurance Rate Redetermination	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions, pricing parameters, and product management practices.
123	Presentation Regarding Cost of Insurance Rate Redetermination	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions, pricing parameters, and product management practices.
127	John Hancock Life Insurance Product Pricing and Management Document	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
128	Proprietary John Hancock Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
129	Memorandum Regarding Cost of Insurance Rate Redetermination	Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product management practices.

<b>Krebs Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
130	Correspondence Regarding Product Management Practices	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product pricing and management practices.
131	Proprietary John Hancock Mortality Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
132	Confidential Correspondence Between John Hancock and State Insurance Regulator	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices.
133	Confidential Correspondence Regarding Conference with State Insurance Regulator	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential product management practices.
134	Presentation Regarding Proprietary John Hancock Mortality Experience and Assumption Development	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
136	Confidential Presentation Submitted to State Insurance Regulator	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices.
137	Confidential Notes Documenting Telephone Conference	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters, projections, and analysis of product performance and profitability.
139	Proprietary Experience Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.

<b>Krebs Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
140	Proprietary Experience Study	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential actuarial assumptions.
145	Confidential Presentation Submitted to State Insurance Regulator	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices.
149	Confidential Submission to State Insurance Regulator Concerning New Product Issuance	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential pricing parameters.
157	Correspondence Regarding Product Management Practices	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product pricing and management practices.
158	Correspondence Regarding Product Management Practices	The Exhibit is sealed in its entirety because it contains discussion of proprietary and confidential product pricing and management practices.
159	Redacted Portions of Excerpts of Transcript of June 24, 2022 Deposition of Gregory Serio	Redactions to the exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and regulatory environment.
N/A	Redacted Portions of Plaintiffs' Opposition to John Hancock's Renewed Motion for Summary Judgment that Refer to and/or Summarize Sealed Exhibits to the Krebs Declaration	Redactions to references and/or summaries in Plaintiffs' Opposition to John Hancock's Renewed Motion for Summary Judgment to the Exhibits to the Krebs Declaration that are the subject of this Motion are approved.
N/A	Redacted Portions of Plaintiffs' Responses and Objections to John Hancock's Rule 56.1 Statement of Undisputed Material Facts that Refer to and/or Summarize Sealed Exhibits	Redactions to references and/or summaries in Plaintiffs' Responses and Objections to John Hancock's Rule 56.1 Statement of Undisputed Material Facts to the Exhibits to the Krebs Declaration

<b>Krebs Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
	to the Krebs Declaration	that are the subject of this Motion are approved.
N/A	Redacted Portions of Plaintiffs' Rule 56.1 Statement of Additional Material Facts in Opposition to John Hancock's Renewed Motion for Summary Judgment that Refer to and/or Summarize Sealed Exhibits to the Krebs Declaration	Redactions to references and/or summaries in Plaintiffs' Rule 56.1 Statement of Additional Material Facts in Opposition to John Hancock's Renewed Motion for Summary Judgment to the Exhibits to the Krebs Declaration that are the subject of this Motion are approved.



**EXHIBIT 3**

<b>Stern Decl. Exhibit</b>	<b>Description</b>	<b>Sealing Treatment</b>
1	Redacted Portions of Transcript of July 6 and July 7, 2022 Depositions of Larry Stern	Redactions to the Exhibit are approved because it contains discussion of proprietary and confidential pricing parameters and product management practices.
N/A	Redacted Portions of Plaintiffs' Opposition to John Hancock's Renewed Motion for Summary Judgment that Refer to and/or Summarize Sealed Exhibits to the Stern Declaration	Redactions to references and/or summaries in Plaintiffs' Opposition to John Hancock's Renewed Motion for Summary Judgment to the Exhibits to the Stern Declaration that are the subject of this Motion are approved.
N/A	Redacted Portions of Plaintiffs' Responses and Objections to John Hancock's Rule 56.1 Statement of Undisputed Material Facts that Refer to and/or Summarize Sealed Exhibits to the Stern Declaration	Redactions to references and/or summaries in Plaintiffs' Responses and Objections to John Hancock's Rule 56.1 Statement of Undisputed Material Facts to the Exhibits to the Stern Declaration that are the subject of this Motion are approved.
N/A	Redacted Portions of Plaintiffs' Rule 56.1 Statement of Additional Material Facts in Opposition to John Hancock's Renewed Motion for Summary Judgment that Refer to and/or Summarize Sealed Exhibits to the Stern Declaration	Redactions to references and/or summaries in Plaintiffs' Rule 56.1 Statement of Additional Material Facts in Opposition to John Hancock's Renewed Motion for Summary Judgment to the Exhibits to the Stern Declaration that are the subject of this Motion are approved.